UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROBERT C. ADLER,

Plaintiff,

1:18-cv-08100 (PAC)

v.

STIPULATION AND [PROPOSED] ORDER

PAYWARD, INC. d/b/a/ KRAKEN.

Defendant.

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties that the time within which Defendant Payward, Inc. d/b/a Kraken may move, answer or otherwise respond to the Complaint is hereby extended up to and including November 1, 2018.

No Provision of this Stipulation and Order shall be construed as a waiver of, and Defendant Payward, Inc. d/b/a Kraken hereby expressly reserves, any and all defenses.

There has been no previous request for extension of time with respect to Defendant Payward, Inc. d/b/a Kraken's time to move, answer or otherwise respond to the Complaint.

Dated: October 18, 2018

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Dated: October 18, 2018

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SO ORDERED:

Hon. Paul A. Crotty United Stated District Judge